

1 BRETT A. AXELROD, ESQ.
 2 Nevada Bar No. 5859
 3 JEANETTE E. MCPHERSON, ESQ.
 4 Nevada Bar No. 5423
 5 NICHOLAS A. KOFFROTH, ESQ.
 6 Nevada Bar No. 16264
 7 ZACHARY T. WILLIAMS, ESQ.
 8 Nevada Bar No. 16023
 9 **FOX ROTHSCHILD LLP**
 10 1980 Festival Plaza Drive, Suite 700
 11 Las Vegas, Nevada 89135
 12 Telephone: (702) 262-6899
 13 Facsimile: (702) 597-5503
 14 Email: baxelrod@foxrothschild.com
 15 jmcpherson@foxrothschild.com
 16 nkoffroth@foxrothschild.com
 17 zwilliams@foxrothschild.com

18 *Counsel for Debtor*

19 Electronically Filed March 8, 2023

20 **UNITED STATES BANKRUPTCY COURT**

21 **DISTRICT OF NEVADA**

22 In re

23 Case No. BK-S-23-10423-MKN

24 CASH CLOUD, INC.,
 25 dba COIN CLOUD,

26 Chapter 11

27 Debtor.

28 **SECOND STIPULATION TO EXTEND
 TIME TO RESPOND TO: 1) DEBTOR'S
 FIRST OMNIBUS MOTION FOR ENTRY
 OF ORDER APPROVING REJECTION OF
 EXECUTORY CONTRACTS AND
 UNEXPIRED LEASES PURSUANT TO 11
 U.S.C. § 365(a) AND DISPOSAL OF
 CERTAIN PERSONAL PROPERTY
 INCLUDING ABANDONMENT; AND 2)
 DEBTOR'S SECOND OMNIBUS MOTION
 FOR ENTRY OF ORDER APPROVING
 REJECTION OF EXECUTORY
 CONTRACTS AND UNEXPIRED LEASES
 PURSUANT TO 11 U.S.C. § 365(a) AND
 DISPOSAL OF CERTAIN PERSONAL
 PROPERTY INCLUDING ABANDONMENT**

29 ////

30 ////

31 ////

1 Cash Cloud, Inc. (“Cash Cloud” or “Debtor”), debtor and debtor in possession in the above-
 2 captioned chapter 11 case (the “Chapter 11 Case”), by and through its undersigned counsel, Fox
 3 Rothschild LLP, and OptConnect Management, LLC (“OptConnect”), by and through is
 4 undersigned counsel, Dechert LLP, hereby enter into this Second Stipulation To Extend Time To
 5 Respond To: 1) Debtor’s First Omnibus Motion For Entry Of Order Approving Rejection Of
 6 Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(a) And Disposal Of
 7 Certain Personal Property Including Abandonment; And 2) Debtor’s Second Omnibus Motion For
 8 Entry Of Order Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To
 9 11 U.S.C. § 365(a) And Disposal Of Certain Personal Property Including Abandonment.

10 **RECITALS**

11 WHEREAS, Debtor filed the Debtor’s First Omnibus Motion For Entry Of Order Approving
 12 Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. § 365(a) And
 13 Disposal Of Certain Personal Property Including Abandonment [ECF 138] (“First Omnibus
 14 Motion”) on February 17, 2023;

15 WHEREAS, Debtor filed the Debtor’s Second Omnibus Motion For Entry Of Order
 16 Approving Rejection Of Executory Contracts And Unexpired Leases Pursuant To 11 U.S.C. §
 17 365(a) And Disposal Of Certain Personal Property Including Abandonment [ECF 141] (“Second
 18 Omnibus Motion”) on February 17, 2023 (the First Omnibus Motion and Second Omnibus Motion
 19 are collectively referred to herein as “Omnibus Motions”);

20 WHEREAS, the hearings on the Omnibus Motions are set for March 17, 2023 at 9:30 a.m.;

21 WHEREAS, the deadline for OptConnect to file a response to the Omnibus Motions was
 22 previously extended from March 3, 2023 to March 8, 2023 (“Response Deadline”) and the deadline
 23 for the Debtor to file a reply was previously extended from March 10, 2023 to March 14, 2023
 24 (“Reply Deadline”); and

25 WHEREAS, the Debtor and OptConnect have agreed to continue the Response Deadline to
 26 12:00 p.m. (noon), Pacific Time on March 13, 2023 and the Reply Deadline to March 16, 2023.

27 **STIPULATION**

28 NOW, THEREFORE, in consideration of the foregoing, the parties agree as follows:

1. The Response Deadline is continued to 12:00 p.m. (noon), Pacific Time on March
2 13, 2023; and

3. 2. The Reply Deadline is continued to March 16, 2023.

4 Dated this 8th day of March, 2023.

Dated this 8th day of March, 2023.

5 **FOX ROTHSCHILD LLP**

DECHERT LLP

6 By: /s/ Jeanette E. McPherson

By: /s/ Craig P. Druehl

7 JEANETTE E. MCPHERSON, ESQ.

CRAIG P. DRUEHL, ESQ.

Nevada Bar No. 5423

Three Bryant Park

8 BRETT A. AXELROD, ESQ.

1095 Avenue of the Americas

Nevada Bar No. 5859

New York, New York 10036-6797

9 NICHOLAS A. KOFFROTH, ESQ.

Nevada Bar No. 16264

10 ZACHARY T. WILLIAMS, ESQ.

Nevada Bar No. 16023

11 1980 Festival Plaza Drive, Suite 700

Las Vegas, Nevada 89135

12 *Counsel for Debtor*

Counsel for OptConnect Management, LLC

FOX ROTHSCHILD LLP
1980 Festival Plaza Drive, Suite 700
Las Vegas, Nevada 89135
(702) 262-6899
(702) 597-5503 (fax)